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(incorrectly named as Travel + Leisure Co.)*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JONATHAN MUNOZ,  
  
Plaintiff,  
  
vs.  
  
TRAVEL + LEISURE CO.,  
  
Defendant.

Case No.: 2:21-cv-01115-RFB-VCF

**UNOPPOSED MOTION TO EXTEND  
DEADLINE TO FILE ANSWER OR  
OTHERWISE RESPOND TO  
AMENDED COMPLAINT (ECF NO. 11)  
  
(FIRST REQUEST)**

Defendant, Wyndham Vacation Resorts, Inc. (incorrectly named as Travel + Leisure Co.) (“Wyndham”), by and through its counsel, Armstrong Teasdale LLP, hereby moves unopposed to extend the deadline for Wyndham to respond to Plaintiff Jonathan Munoz’s Amended Complaint (ECF No. 11) from August 26, 2022, to September 9, 2022. Plaintiff, who is proceeding in pro se, confirmed that he agrees to the short extension. This is the first request to extend this deadline.

Subsequent to this Court’s review of the pleadings pursuant to 28 U.S.C. § 1915(e)(2)(B), Plaintiff served a copy of the Summons and Amended Complaint (ECF No. 5) on the then named defendant, Wyndham Hotels & Resorts, Inc., on July 20, 2022. Thereby making the deadline to answer or otherwise respond to the Amended Complaint on August 10, 2022.

Thereafter, on August 1, 2022, Plaintiff filed another Amended Complaint (“Second Amended Complaint”) identifying Travel + Leisure Co. as the only defendant. Plaintiff purportedly removed Wyndham Hotels & Resorts, Inc. after Wyndham Hotels & Resorts, Inc. notified Plaintiff that it is not involved in timeshares. The Clerk of Court issued the Summons to Travel + Leisure

1 Co. on August 5, 2022. (ECF No. 12.)

2 On August 5, 2022, Wyndham, through its counsel, agreed to accept service of the Summons  
3 and Second Amended Complaint, thereby making Wyndham's response deadline August 26, 2022.

4 Nevertheless, out of an abundance of caution, Wyndham files the instant motion requesting  
5 additional time to answer or otherwise respond to the Second Amended Complaint prior to the  
6 deadline originally set for Wyndham Hotels & Resorts, Inc. to respond.

7 Good cause exists to allow Wyndham additional time to respond to the Second Amended  
8 Complaint. In particular, Wyndham only recently became aware of this action as it was originally  
9 served on Wyndham Hotels & Resorts, Inc. Wyndham requires additional time to gather and  
10 evaluate the documents and information regarding the timeshare contracts at issue in this action as  
11 well as Plaintiff's use history so that Wyndham can adequately respond to the allegations in the  
12 Second Amended Complaint. Notably, the contracts and allegations at issue in this action go back  
13 almost a decade to 2013 and 2015. Plaintiff confirmed in writing on August 3, 2022, that he is not  
14 opposed to this short extension of the response deadline.

15 This request is made in good faith and is not intended to unreasonably delay this matter. The  
16 Summons in this action was only recently issued, the parties have not yet held their case conference  
17 under Fed. R. Civ. P. 26(f), and a scheduling order has not been issued.

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1 Based on the foregoing, Wyndham respectfully requests that this Court extend its deadline to  
2 answer or otherwise respond to the Second Amended Complaint to September 9, 2022.

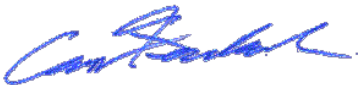
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4 Dated this 9<sup>th</sup> day of August, 2022.

**ARMSTRONG TEASDALE LLP**

5 By: /s/ Michelle D. Alarie  
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*Attorneys for Defendant Wyndham Vacation  
Resort, Inc. (improperly named as Travel +  
Leisure Co.)*

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13 IT IS SO ORDERED.

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15 Cam Ferenbach  
16 United States Magistrate Judge

17 8-9-2022

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**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5 (b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of ARMSTRONG TEASDALE LLP, and that the foregoing was served:

☒ via electronic service to the address(es) shown below:

Jonathan Munoz – Jonathan.b.munoz@outlook.com

☐ via the U.S. Postal Service at Las Vegas, Nevada, in a sealed envelope, with first-class postage prepaid, on the date and to the address(es) shown below:

Jonathan Munoz  
7040 Wedgewood Way  
Las Vegas, NV 89147

Date: August 9, 2022

/s/ Christie Rehfeld

An employee of Armstrong Teasdale LLP